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Submitted as PDF via e-mail to: jmartin@waterboards.ca.gov

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**Subject: Comments on Central Valley Salinity Project Final Draft Report
March 24, 2008, Version****Board of Directors****Representing:**

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

The Sacramento Regional County Sanitation District (SRCSD) provides sanitary sewer collection, conveyance, treatment and reclamation to over one million residents in the Sacramento area. On average, over 165 million gallons of wastewater are collected, treated and safely discharged each day. We appreciate the opportunity to comment on the March 24, 2008 Central Valley Salinity Project Final Draft Report, which assesses the economic and social impacts of increasing salinity in the Central Valley if a comprehensive salinity management program is not implemented. The District does not agree with the conclusion of the draft economic study prepared by U.C. Davis which identifies municipalities as the single largest source of salinity in the Central Valley. The District supports the Central Valley Clean Water Agency's (CVCWA) comments submitted on April 16, 2008, (which is attached) and agrees that the flawed model that led to the finding should be corrected in the final report.

In addition to the comments submitted by CVCWA, the District is providing the following comments that are general in nature and relate to the following two main themes:

- Stakeholder processes need to actively engage the various parties and need to determine a fair and equitable distribution of cost in the development and implementation of a salinity management plan, and
- Sound science and data is critical to lay the groundwork for a fair and equitable way of determining costs in relationship to demonstrable and measurable environmental improvements.

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District Engineer

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Wendell H. Kido
District Manager

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Chief Financial Officer

Stakeholder Process

The District is supportive of a stakeholder driven process for developing a Basin Plan Amendment for salts in the Central Valley and commends the Central Valley Regional Water Quality Control Board (Regional Board) for recommending this type of approach to basin planning. We have devoted resources through CVCWA, by having staff attend all committee meetings and Chairing the Economic Impact Study Committee. However, for a stakeholder process to be successful there must be open communication and all parties must have input into the identification of key issues and concerns, the development of committee agendas, work plans and activities, and the commitment to find creative solutions. The District has the following recommendations to help foster that stakeholder environment and improve the committee structure.

- 1) Establish a process for the selection of committee members and chairpersons that encourages broad stakeholder participation. Stakeholders need to take a leadership role and chair the committees, with Water Board staff providing staff support.
- 2) Request the committee Chairs to take a lead role in helping to set meeting dates, develop agendas, review meeting minutes, and distributing relevant materials and information directly to the committee members and other interested parties.
- 3) Provide committees the opportunity to identify key issues and concerns, develop work plans and scopes of work for projects and studies the committee decides should be completed, whether the funding is available or not.
- 4) Continue to fund a facilitator for this process.

We recognize that to move a stakeholder process forward, funding is a key parameter that must be addressed. The Regional Board can help identify potential funding sources or opportunities to explore for partnering in areas outside the regulatory programs they oversee, such as the San Joaquin River Restoration Program. The Regional Board can also play a key role to help bring all the parties to the table and participate as a partner in the process. In addition, associations and organizations representing the various stakeholder groups can also be used to leverage funding and manage contracts, as these entities generally allow more flexibility than State contracting. And finally, watershed programs such as the Sacramento River Watershed Program and the San Joaquin River Restoration Program should also be engaged in this process. They can help identify and implement watershed solutions to complex problems not only in the Central Valley, but throughout the state.

Additionally, the Regional Board staff can assist with communicating and coordinating with other state departments and federal agencies that have a role in salinity solutions, such as the State Water Board, Department of Water Resources, Department of Public Health, Department of Fish and Game, United States Geologic Survey, United States Bureau of Reclamation, etc. For instance, one oversight in the report is the contribution of the state and federal water projects to salinity in the Central Valley and the water supply to Southern California. The state and federal water projects water is used to blend with higher salinity Colorado River water in Southern California. This implies a statewide problem, greater than the Central Valley. However, the State Water Board involvement with salinity has been limited to the San Francisco Bay-San Joaquin/Sacramento Delta Basin Plan South Delta water quality objectives and water rights. Considering the difficulty in getting the water purveyors, outside the state contractors, to actively be involved in this effort, perhaps there is some role the State Water Board or Department of Public Health should play as a stakeholder in this process.

Development of Technical Information and Sound Science

We believe that sound science lays the groundwork for a fair and equitable way of determining costs in relationship to demonstrable and measurable environmental improvements. The Technical Advisory Committee (TAC) has been discussing salt sources, sinks, and potential solutions for over a year now, and has still not made any recommendations. We believe that some of the efforts of the TAC need to be completed before the completion of the Economic Study. The order of completing the technical studies before the economic study makes sense, as economic estimates of salt loads is not the same as technical estimates from scientists in their respective fields of agriculture, water supply, drinking water and wastewater treatment, and industry (such as the water softening industry, food processors, pharmaceuticals, etc.). Although this approach will take longer because of the difficulty in getting agreement among the scientific and business communities, the end result will be more meaningful, since the stakeholders will need to work through the issues and reach consensus.

Conclusion

In general, the committees should develop workplans and scopes of work that are agreed upon in advance and that can withstand scientific scrutiny - possibly through a scientific peer review process that could be established and funded through multiple stakeholders. We believe the draft economic report could be greatly improved, had a peer review been performed.

The District is willing to continue to support an improved stakeholder process, so long as there is a transparent effort to scientifically determine each source's contribution to the problem. We look forward to continuing to work with the Regional Board and all stakeholders to develop a salinity management plan that fairly and equitably distributes costs for the plan's development and implementation to effectively control and reduce salinity impacts in the Central Valley.

Sincerely,



Wendell H. Kido
District Manager

Attachment: CVCWA April 16, 2006, Comment Letter on Salinity Project Final Draft Report

Cc: Mary Snyder – SRCSD
Terrie Mitchell – SRCSD
Linda Dorn – SRCSD
Debbie Webster – CVCWA
Pamela Creedon – Executive Officer, CVRWQCB
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